



Docket No. 55709 (47035)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT: M. Brett et al.
U.S. SERIAL NO.: 09/806,003 EXAMINER: P. Natnael
FILED: June 15, 2001 GROUP: 2614
FOR: METHOD AND CIRCUIT ARRANGEMENT FOR PICTURE-IN-
PICTURE INSERTION

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CERTIFICATE OF EXPRESS MAILING

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service on this date September 20, 2004 in an envelope as "Express Mail Post Office to Addressee," mailing Label Number EV437818505US addressed to the: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

By: Michelle Chicos
Michelle P. Chicos

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Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

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RESPONSE TO OFFICE ACTION

Applicants are in receipt of the Office Action dated May 18, 2004 of the above-identified application. A request for a one-month extension of time is submitted herewith. Applicants respond to the Office Action as follows.

Claims 14-26 were rejected under 35 USC 103(a) as being unpatentable over U.S. Patent 5,369,442 to Braun. It appears that the rejection under 35 USC 102(b) was withdrawn in favor of this obviousness rejection. These rejection(s) are respectfully traversed.

Braun does not teach or suggest a method or circuit arrangement for picture-in-picture insertion, including a memory device with a storage capacity of **less than** two insertion pictures, where more than one memory segment is required for storing an insertion picture.

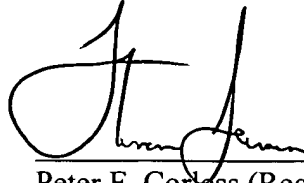
On page 3 of the Office Action of 05/18/2004, it was admitted that Braun does not disclose a memory device having a storage capacity of less than two insertion pictures. The Examiner then cited an excerpt of Braun stating that "the memory device can store more than two small pictures" (see column 12, lines 31-48).

However, Braun still does not teach or suggest a memory device for storing **less than** two insertion pictures. Moreover, there is no teaching or suggestion that more than one memory segment is required for storing an insertion picture. In Braun, each memory region (SP1, SP2) stores exactly one insertion picture. If the memory device SP were somehow modified to store less than two insertion pictures, e.g., if the storage capacity of each memory region SP1, SP2 was reduced to less than one picture, it would result in the read operations overtaking the write operations. Therefore, the proposed modification of Braun would result in a non-functioning picture-in-picture insertion device. Moreover, the suggestion of a memory device having a storage capacity of less than two insertion pictures was gleaned from the Applicants' specification, and only with the benefit of hindsight reasoning.

In contrast, according to FIGS. 2a to 2c of the Applicants' invention, the memory device has a storage capacity of 1.5 fields and is subdivided into three memory segments X, Y, and Z, where all three segments have the same size and are continuously overwritten. According to the Applicants' claimed invention, more than one memory segment (X, Y, and Z) is required for storing an insertion picture, and the total storage capacity of the memory device is less than two insertion pictures.

It is believed the application is in condition for immediate allowance, which action is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Peter F. Corless', written over a horizontal line.

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